

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 17-34142-H2-13</b>
<b>Joseph Ford, III</b>	§	
	§	
	§	
<b>DEBTOR(S)</b>	§	<b>CHAPTER 13</b>

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS  
AND REQUEST FOR HEARING**

Joseph Ford, III opposes the Trustee's Motion to Dismiss filed on or about September 26, 2019.

Debtor plans to come current on plan payments and would like to request additional time.

Debtor requests a hearing.

Debtor requests that the Trustee's Motion to Dismiss be DENIED.

Respectfully submitted,  
KEELING LAW FIRM

/s/Kenneth A. Keeling

Kenneth A. Keeling; TBN 11160500

Yolanda Gutierrez; TBN 24041028

Cristina Rodriguez; TBN 24049980

Rebecca Keeling; TBN 24083295

3310 Katy Freeway, Suite 200

Houston, Texas 77007

Tel: (713) 686-2222; Fax (713) 579-3058

legal@keelinglaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all parties electronically or by U.S. First Class Mail on October 3, 2019.

United States Trustee  
515 Rusk, Suite 3516  
Houston, TX 77002

William E Heitkamp  
9821 Katy Freeway  
Suite 590  
Houston, TX 77024

Joseph Ford, III  
14343 Long Shadow Drive  
Houston, TX 77015

/s/Kenneth A. Keeling

KENNETH A. KEELING